

**McKool Smith**

 **PRYOR CASHMAN LLP**

MEMORANDUM ENDORSED

February 14, 2025

By ECF

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Courtroom 6B  
New York, New York 10007-1312

Re: Marc Restellini v. The Wildenstein Plattner Institute, Inc.  
20 Civ. 4388 (AT) (GWG)

Dear Judge Gorenstein:

This is a joint letter submitted on behalf of all parties.

The parties have previously provided various updates regarding their settlement discussions and, based on those discussions, the Court has stayed and, thereafter, continued the stay, of various litigation-related deadlines. The most recent stay expires on February 14, 2025. *See* ECF No. 177, 179, 181, 183, 185, 187, 189, 191, 193.

Since the parties' last update to the Court, the parties have expended very significant efforts to finalize a settlement agreement and are very close to doing so. The parties are now working through what they hope are final details. The principal issues that remain concern the process the parties will follow in connection with the identification of the numerous physical and electronic documents at issue to actually implement the terms of the settlement. The parties are endeavoring to design a process that will be both executable and will minimize future disputes between them. The Court will recall the materials at issue in this litigation consist of a large repository of paper and electronic documents.

Throughout this process, the parties have retained, and extensively utilized the assistance of, a JAMS mediator who has been closely involved.

Based on the foregoing, the parties jointly request that the Court continue the stay until March 14, 2025, to permit the parties to finalize their settlement agreement.

Hon. Gabriel W. Gorenstein  
February 14, 2025  
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Respectfully submitted,

PRYOR CASHMAN LLP

*/s/ William L. Charron*

By:

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*/s/ Daniel W. Levy*

By:

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Attorneys for Plaintiff Marc Restellini

Extension of the stay of deadlines through  
and including March 14, 2025, is granted.

So Ordered.

  
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GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
February 14, 2025